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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA
VIVAS CASTILLO, A.C.A., SHERIKA BLANC,
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-1766-EMC

**DECLARATION OF EMILOU MACLEAN
IN SUPPORT OF UNOPPOSED
ADMINISTRATIVE MOTION OF
PLAINTIFFS A.C.A. AND G.S. TO
PROCEED UNDER PSEUDONYM**

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1 I, Emilou MacLean, declare as follows:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of
3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of
4 record in this action for Plaintiffs. I have personal knowledge of the facts set forth in this declaration
5 and, if called as a witness, I could and would testify competently thereto.

6 2. I file this Declaration in support of the Unopposed Administrative Motion of
7 Plaintiffs A.C.A. and G.S. to Proceed Under Pseudonym (“Administrative Motion”).

8 3. On February 19, 2025, Plaintiffs filed an Initial Complaint challenging the
9 Department of Homeland Security’s unlawful decision to “vacate” the January 17, 2025 extension of
10 Temporary Protected Status (TPS) for Venezuela and to terminate the 2023 designation of TPS for
11 Venezuela. On March 20, 2025, Plaintiffs filed an Amended Complaint to add claims challenging
12 the Department of Homeland Security’s similarly unlawful decision to partially “vacate” the July 1,
13 2024 extension of TPS for Haiti. Plaintiffs’ challenge to the Department of Homeland Security’s
14 TPS determinations for Venezuela and Haiti are premised on the same legal arguments that these
15 determinations violate the Administrative Procedure Act (“APA”) and the anti-discrimination
16 guarantee of the Fifth Amendment’s Due Process Clause.

17 4. Plaintiffs, including A.C.A. and G.S., are suing Kristi Noem (in her official capacity
18 as Secretary of Homeland Security), the Department of Homeland Security, and the United States of
19 America (collectively “Defendants”). For the reasons explained more fully in their declarations,
20 A.C.A. and G.S. fear retaliation by the Defendants against them. Defendants could, for example,
21 seek to retaliate, among other ways, in connection with A.C.A. and G.S.’s immigration status.
22 A.C.A. and G.S. also face the risk of retaliation from actors in their local communities.

23 5. On March 19, 2025, I asked Defendants’ counsel whether they would stipulate to this
24 administrative motion to proceed via pseudonym. Defendants’ counsel responded on March 20, 2025
25 that they “do not oppose the new plaintiffs proceeding[] via pseudonym.”

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 20th day of March 2025, in San Francisco, California.

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5 /s/ Emilou MacLean

Emilou MacLean